

MEMO ENDORSED

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VIA ECF

Honorable Justice Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

RE: *United States v. Chantal De Los Santos*
1:24 Cr. 508 (VEC)

Honorable Justice Valerie E. Caproni;

I, Dawn M. Florio, attorney at law, represents Chantal De Los Santos on the above case matter scheduled to surrender herself to the USMS in SDNY at 12:00 p.m. on 3/13/2025. I was contacted by Ms. De Los Santos and she has requested to travel to the Dominican Republic between the dates of February 13-February 23, which are her childrens' mid-winter recess break, to tell her parents before her surrender in person that she has to do jail time. Her parents are elderly and she feels that this is something that has to be done in person and not over the phone. Also to explain that they have to return to New York before her surrender to prepare them with plans to care for her children while she is incarcerated.

I have spoken to AUSA Jacob Rebold, in which the Government opposes this request and USPTO Jessica Aguilar-Adan has no objection.

I am requesting that this application be acknowledged and considered.

Sincerely,

Dawn M. Florio

Dawn M. Florio, Esq.
Attorney for Chantal De Los Santos

CC: All Counsel

Application DENIED. Although the Court can appreciate that the conversation Ms. De Los Santos must have with her parents will be difficult, it does not require that she leave the country in order to do so. Ms. De Los Santos's parents are not "elderly" as the letter motion suggests, as her father is 65 and her mother is 53. See PSR ¶ 142, Dkt. 37. Moreover, Ms. De Los Santos has had ample time to apprise her parents of the criminal charges against her and her conviction. Ms. De Los Santos was first presented in federal court on April 9, 2024. She pled guilty to the Information on August 27, 2024 pursuant to a plea agreement, which clearly laid out the stipulated guidelines range for imprisonment.

SO ORDERED.



1/29/25

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE